veri on

Dark Fiber Inquiry Form **Inquiry Number:** CTCCNHDOVRMNCH12-5-1SD

CLEC Section (E-mail form to une.dfi@verizzon.com

CLEC Name	CTC Communications Corp	Date Sent	12/5/01
CLEC Contact	Randy Schmid	Tel Number	781-522-8739
Street	220 Bear Hill Road	Fax Number	781-522-8798
Floor/Room			
City & State	Waltham, MA 02451	E-Mail	Rschmid@ctcNet.com

Location Information Section

Primary Location	Verizon Central Office	POI CLLI	DOVRNHTH
Street	57 Saint Thomas Street		
City & State	Dover, New Hampshire	LATA	122
Additional Information			
Secondary Location	Verizon Central Office	XPOI CLLI	MNCHNHCO
Street	25 Concord Street		
City & State	Manchester, New Hampshire	NPA-NXX	603-518
Additional Information			

Number Of Fiber **Pairs** Required (Each Pair Equals 2 Strands) 2

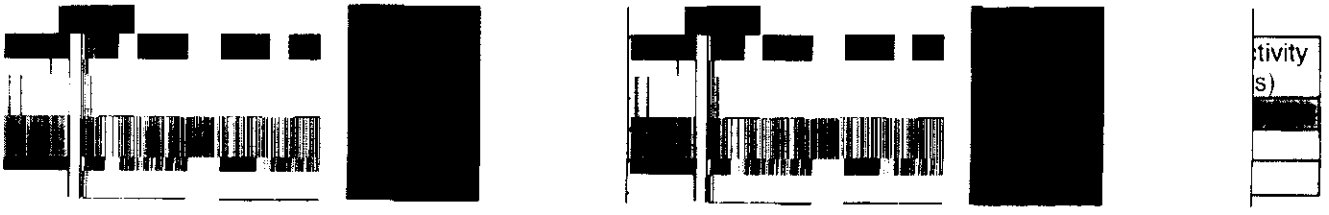
Service Delivery Engineer (SDE) Information Section

Date Received	12/5/01	Date Forward to Engineering	12/5/01
SDE	Sean Duggan	Tel Number	617-743-1936
Street	125 High St., Rm 1256	FAX Number	617-261-6461
City & State	Boston, MA 02110	E-Mail	Sean.m.duggan@verizon.com
Date Reply To CLEC			

Engineering Information Section

Date Received	12/8/01	Reply To SDE By	12/27/01
Engineer	Harv Tasch	Reply DDate	12/19/01
Street	240 East 38th Street	Tel Numhber	212-338-8698
City & State	New York, NY, 10016	FAX Numhber	212-370-2050
Organization	IOF Planning	E-MMail	Harvey.Tasch@Verizon.com
Comments	NO DIRECT ROUTE: DOVRNHTH-BNTONHPR-NWWDDNHYA-EDSMNHBH-CNCRNHSO-MNCHNHCO NO SPARE FIBERS AVAILABLE		

Fibers Available To Meet Request (Y/N) N If NO, Number Of Fiber **Pairs** ##



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<sean.m.duggan@verizon.com>

01/17/02 03:32 PM

To: rschmid@CTCNet.com
cc:
Subject: Dover to Manchester NH Cable documentation

Randy,

As discussed here is the documentation for the NH inquiry.

(See attached file: dover-manchester.ppt)(See attached file Dove-Manchester fiber route.doc)(See attached file: CTCCNHDOVRMNCH12-5-1SD.doc)

Please call with any questions/concerns and I'll try to clarify

Thanks,
Sean

- dover-manchester.ppt
- Dove-Manchester fiber route.doc
- CTCCNHDOVRMNCH12-5-1SD.doc

The legend for the ASGT ACTIVITY columns are:

W Working & in-effect
$ Spare
J Jumpered fiber is open, defective, or reserved for pending service requirement

COMMAND CABLE BULK ASSIGNMENT ANND SCAN (CBLS) /FOR
TERM A DOVRNHTH TERM Z BNTONHPR CAABLE 7760 SUBPATH CT0001
FROM UNIT 00001 LAST UNIT 00012 QTY SPARRE 0000 TOT QTY 0012
CMPL DATE 12 16 91 INV STAT IE 2-W SPARESS 0000 1-W SPARES 0000
FAC DETAIL LGS FAC USE G FAC GROUP COMP ID
NO OF SPRS NO OF WIRES SHLD/DIR CKKT/CLO SCAN N

ASGT DATA: ALT/PRI DR CLASS MISUSE MMW
TERMN: FRAMES SEQ NBR

SUBD ASGT ACTIVITY UNIT	F	T	RSTN	CUR	PND	D	F	CKTID/CLO			DUE DATE
00001	W	W	Y	C	301			/T6X2P	/CNCRNHSO	/MNCCHNHCO	03029
00002	W	W	Y	C	301			/T6X2P	/CNCRNHSO	/MNCCHNHCO	03029
00003	W	W	Y	C	301			/T6X2P	/DOVRNHTH	/MNCCHNHCO	02249
00004	W	W	Y	C	301			/T6X2P	/DOVRNHTH	/MNCCHNHCO	02249
00005	W	W	Y	C	305			/T3X2P	/DOVRNHTH	/ROCCHNHWE	12069
00006	W	W	Y	C	305			/T3X2P	/DOVRNHTH	/ROCCHNHWE	12069
00007	W	W		C	1001			/OC12	/BNTONHPR	/DOVRRNHTH	031196
00008	W	W		C	1001			/OC12	/BNTONHPR	/DOVRRNHTH	031196
00009	W	W		C	1001			/OC12	/DOVRNHTH	/NWODDNHYA	112197
00010	W	W		C	1001			/OC12	/DOVRNHTH	/NWODDNHYA	112197
00011	W	W		S	83/LXFU/150020			/NE		02129	
00012	W	W		S	83/LXFU/150020			/NE		02129	
00013	W	W		C	1001			/OC48	/CNCRNHSO	/DOVRRNHTH	021497
00014	W	W		C	1001			/OC48	/CNCRNHSO	/DOVRRNHTH	021497
00015	W	W		C	1001A			/OC48	/DOVRNHTH	/ROCCHNHWE	081999
00016	W	W		C	1001A			/OC48	/DOVRNHTH	/ROCCHNHWE	081999
00017	W	W		C	1002			/OC12	/DOVRNHTH	/NWODDNHYA	020100
00018	W	W		C	1002			/OC12	/DOVRNHTH	/NWODDNHYA	020100
00019	J	J		PENDING	DWDMNH01						
00020	J	J		PENDING	DWDMNH01						
00021	$	$									
00022	J	J		MTCE	SPARE						
00023	J	J		MTCE	SPARE						
00024	J	J		PENDING	NHNOKN						
00025	J	J		PENDING	NHNOKN						
00026	W	W		C	3002			/OC48	/CNCRNHSO	/DOVRRNHTH	020400
00027	W	W		C	3002			/OC48	/CNCRNHSO	/DOVRRNHTH	020400
00028	W	W		C	101			/OMC	/CNCRNHSO	/DOVRRNHTH	020501
00029	W	W		C	101			/OMC	/CNCRNHSO	/DOVRRNHTH	020501
00030	J	J		MAINTENANCE	SPARE						
00031	J	J		MAINTENANCE	SPARE						
00032	$	$									
00033	$	$									
00034	$	$									
00037	JMP	J	J	OPEN	FIBER						
00038	JMP	J	J	OPEN	FIBER						
00039	W	W		S	74/LMDA/72578	[redacted]					021296
00040	W	W		S	74/LMDA/72578	[redacted]					021296

COMMAND CABLE BULK ASSIGNMENT AND SCAN (CBLS) /FOR
TERM A BNTONHPR TERM Z NWODNHYA CABLE 7639 SUBPATH CT000F
FROM UNIT 00001 LAST UNIT 00012 QTY SPARE 0000 TOT QTY 0012
CMPL DATE 12 31 91 INV STAT IE 2-W SPARES 0000 1-W SPARES 0000
FAC DETAIL LGS FAC USE G FAC GROUP COMP ID
NO OF SPRS NO OF WIRES SHLD/DIR CKT/CLO SCAN N

ASGT DATA: ALT/PRI DR CLASS MISUSE MMW
TERMN: FRAMES SEQ NBR
SUBD ASGT ACTIVITY

UNIT	F	T	RSTN	CUR	PND	D	F	CKTID/CLO		DUE DATE
00001		W	W	Y	C	301	/T6X2P	/CNCRNHSO	/MNCCHNHC(	030293
00002		W	W	Y	C	301	/T6X2P	/CNCRNHSO	/MNCCHNHC(	030293
00003		W	W	Y	C	301	/T6X2P	/DOVRNHTH	/MNCCHNHC(	022493
00004		W	W	Y	C	301	/T6X2P	/DOVRNHTH	/MNCCHNHC(	022493
00005		W	W		C	1001	/OC12	/DOVRNHTH	/NWODDNHYA	112197
00006		W	W		C	1001	/OC12	/DOVRNHTH	/NWODDNHYA	112197
00007		J	J		PENDING_DWDMNH01					
00008		J	J		PENDING_DWDMNH01					
00009		J	J		MTCE SPARE					
00010		J	J		MTCE SPARE					
00011	DEF	J	J		DEFECTIVE			0012601		
00012		W	W		C	1003	/OC12	/NWODNHYA	/ROCCHNHWE	090999
00013		W	W		C	1001	/OC48	/CNCRNHSO	/DOVRRNHTH	021497
00014		W	W		C	1001	/OC48	/CNCRNHSO	/DOVRRNHTH	021497
00015		W	W		C	1001	/OC12	/DOVRNHTI	/NWODDNHYA	061299
00016		W	W		C	1001	/OC12	/DOVRNHTI	/NWODDNHYA	061299
00017		W	W		C	3001	/OC48	/CNCRNHSO	/ROCHHNHWE	051701
00018		W	W		C	3001	/OC48	/CNCRNHSO	/ROCHHNHWE	051701
00019		W	W		C	1003	/OC12	/NWODNHYA	/ROCCHNHWE	090999
00020		W	W		C	1002	/OC12	/DOVRNHTH	/NWODDNHYA	020100
00021		W	W		C	1002	/OC12	/DOVRNHTH	/NWODDNHYA	020100
00022		W	W		C	3002	/OC48	/CNCRNHSO	/DOVRRNHTH	020400
00023		W	W		C	3002	/OC48	/CNCRNHSO	/DOVRRNHTH	020400
00024		J	J		MTCE SPARE					
00025	DEF	J	J		DEFECTIVE			0080100		
00026	DEF	J	J		DEFECTIVE			0080100		
00027	DEF	J	J		DEFECTIVE			0012601		
00028	DEF	J	J		DEFECTIVE			0012601		
00029	DEF	J	J		DEFECTIVE			0072900		
00030	DEF	J	J		DEFECTIVE			0072900		
00031		W	W		C	101	/OMC	/CNCRNHSO	/DOVRRNHTH	020501
00032		W	W		C	101	/OMC	/CNCRNHSO	/DOVRRNHTH	020501

COMMAND CABLE BULK ASSIGNMENT AND SCAN (CBLS) /FOR
TERM A EPSMNHBH TERM Z CNCRNHSO CABLE 7748 SUBPATH CT0S0F
FROM UNIT 00001 LAST UNIT 00004 QTY SPARE 0000 TOT QTY 0004
CMPL DATE 03 20 96 INV STAT IE 2-W SPARES 0000 1-W SPARES 0000
FAC DETAIL LGS FAC USE G FAC GROUP COMP ID A
NO OF SPRS NO OF WIRES SHLD/DIR CKT/CLO SCAN N

ASGT DATA: ALT/PRI DR CLASS MISUSE MW
TERMN: FRAMES SEQ NBR
SUBD ASGT ACTIVITY

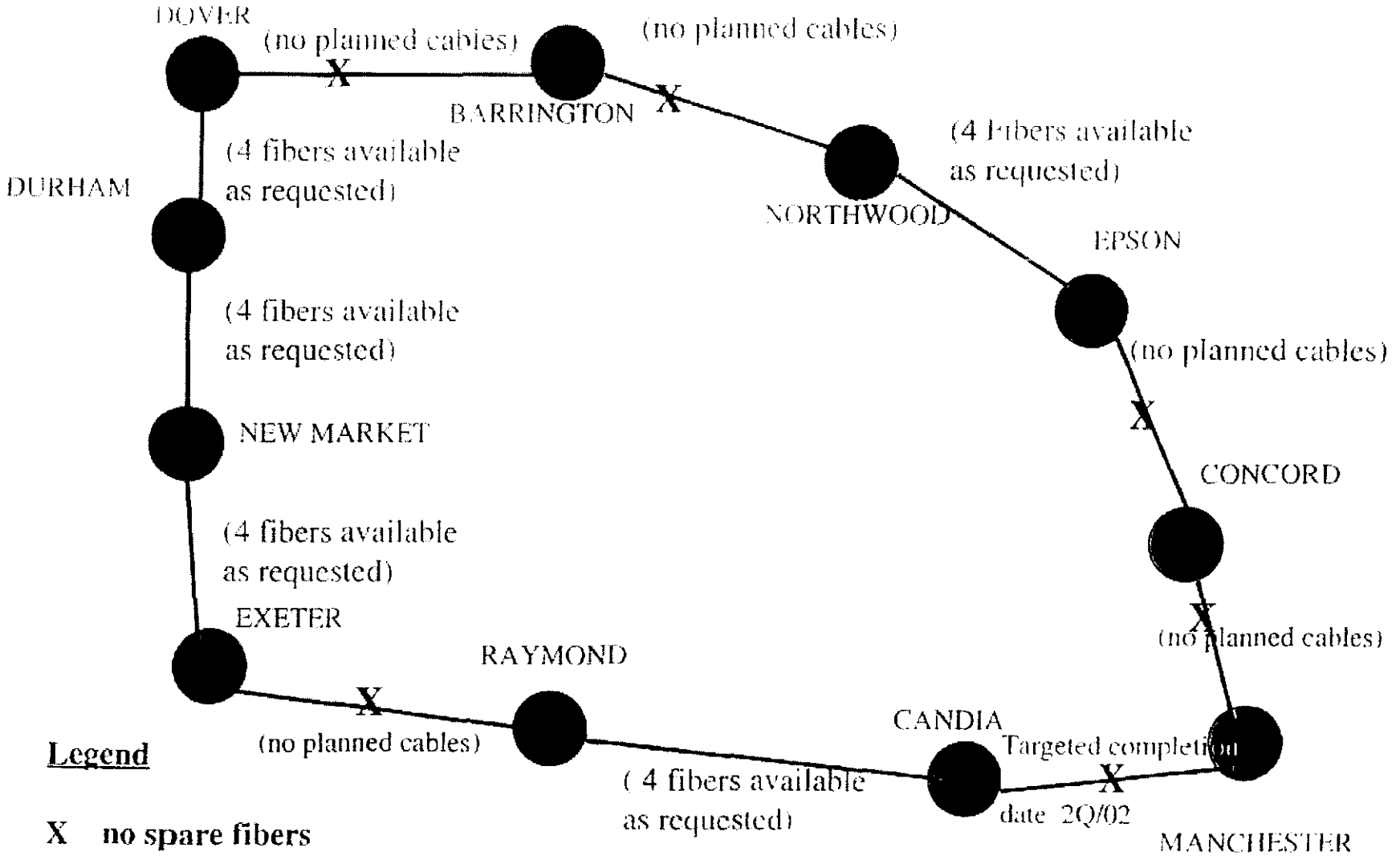
UNIT	F	T	RSTN	CUR	PND	D	F	CKTID/CLO	DUE DATE
00001	DEF	J	J	OPEN IN SHEATH					
00002		J	J	C	MTCE FIBER			121500	
00003		W	W	C	101	/OMC	/CNCRNHSO	/DOVRNHTH	020501
00004		W	W	C	101	/OMC	/CNCRNHSO	/DOVRNHTH	020501
00005		W	W	Y	C	301	/T6X2P	/CNCRNHSO	/MNCHNHCO 030293
00006		W	W	Y	C	301	/T6X2P	/CNCRNHSO	/MNCHNHCO 030293
00007		W	W	Y	C	301	/T6X2P	/DOVRNHTH	/MNCHNHCO 022493
00008		W	W	Y	C	301	/T6X2P	/DOVRNHTH	/MNCHNHCO 022493
00009	DEF	$	$						
00010		J	J	MTCE FIBER					
00011		W	W	C	1001	/OC48	/CNCRNHSO	/DOVRNHTH	021497
00012		W	W	C	1001	/OC48	/CNCRNHSO	/DOVRNHTH	021497
00013		W	W	C	1001	/OC12	/CNCRNHSO	/NWODNHYA	072397
00014		W	W	C	1001	/OC12	/CNCRNHSO	/NWODNHYA	072397
00015		J	J	PENDING_DWDMNH01					
00016		J	J	PENDING DWDMNH01					
00017		W	W	C	1002	/OC12	/CNCRNHSO	/NWODNHYA	112197
00018		W	W	C	1002	/OC12	/CNCRNHSO	/NWODNHYA	112197
00019		J	J	PENDING NHNOQD					
00020		J	J	PENDING NHNOQD					
00021		W	W	C	1005	/OC12	/CNCRNHSO	/NWODNHYA	090999
00022		W	W	C	1005	/OC12	/CNCRNHSO	/NWODNHYA	090999
00023		W	W	C	3001	/OC48	/CNCRNHSO	/ROCHNHWE	051701
00024		W	W	C	3001	/OC48	/CNCRNHSO	/ROCHNHWE	051701
00025		W	W	C	1001	/OC12	/CNCRNHSO	/EPSMNHBH	032200
00026		W	W	C	1001	/OC12	/CNCRNHSO	/EPSMNHBH	032200
00027		W	W	C	3002	/OC48	/CNCRNHSO	/DOVRNHTH	020400
00028		W	W	C	3002	/OC48	/CNCRNHSO	/DOVRNHTH	020400

COMMAND CABLE BULK ASSIGNMENT AND SCAN (CBLS) /FOR
TERM A CANDNHDE TERM Z MNCHNHCO CABLE 8076 SUBPATH CT000F
FROM UNIT 00003 LAST UNIT 00006 QTY SPARE 0001 TOT QTY 0004
CMPL DATE 11 24 95 INV STAT IE 2-W SPARES 0000 1-W SPARES 0000
FAC DETAIL LGS FAC USE G FAC GROUP COMP ID A
NO OF SPRS NO OF WIRES SHLD/DIR CKT/CLO SCAN N

ASGT DATA: ALT/PRI DR CLASS MISUSE MMW
TERMN: FRAMES SEQ NBR
SUBD ASGT ACTIVITY

UNIT	F	T	RSTN	CUR	PND	D	F	CKTID/CLO	DUE DATE
00003	W	W	C	1001	/OC12	/DRFDNHCC		/MNCHHNHCO	032200
00004	W	W	C	1001	/OC12	/DRFDNHCC		/MNCHHNHCO	032200
00005	$	A	SIS009366001					0122102	
00006	$	$	C	1001	/OC12P	/MNCHNHCO		/RYMNNNHFL	060597
00007	W	W	C	1002	/OC48	/EXTRNHCE		/MNCHHNHCO	021497
00008	W	W	C	1002	/OC48	/EXTRNHCE		/MNCHHNHCO	021497
00009	W	W	C	1001	/OC48	/EXTRNHCE		/MNCHHNHCO	060597
00010	W	W	C	1001	/OC48	/EXTRNHCE		/MNCHHNHCO	060597
00011	W	W	C	1001	/OC12	/MNCHNHCO		/RYMMNNHFL	060597
00012	W	W	C	1001	/OC12	/MNCHNHCO		/RYMMNNHFL	060597
00013	W	W	C	1001	/OC12P	/MNCHNHCO		/RYMMNNHFI	060597
00014	W	W	C	1001	/OC12P	/MNCHNHCO		/RYMMNNHFI	060597
00015	W	W	C	1001	/OC48	/MNCHNHCO		/RYMMNNHFL	020498
00016	W	W	C	1001	/OC48	/MNCHNHCO		/RYMMNNHFL	020498
00017	J	J	PENDING_NHNOJH						
00018	J	J	PENDING_NHNOJH						
00019	W	W	C	101	/OMC	/EXTRNHCE		/MNCHHNHCO	020501
00020	W	W	C	101	/OMC	/EXTRNHCE		/MNCHHNHCO	020501
00021	J	J	PENDING_DWDMNH01						
00022	J	J	PENDING_DWDMNH01						
00023	W	W	S	74/LMDA/72578	/NE	/1		021296	
00024	W	W	S	74/LMDA/72578	/NE	/1		021296	

Dover-Manchester
Fiber Blockage



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Dark Fiber Inquiry Form **Inquiry Number:** CTCCBURLWLST8-27-1ML

CLEC Section (E-mail form to une.dfi@verizon.com)

CLEC Name	CTC Communications	Date Sent	8/27/01
CLEC Contact	Craig Cucchiara	Tel Number	781.522.8667
Street	220 Bear Hill Rd	Fax Number	781.522.8798
Floor/Room			
City & State	Waltham MA 02451	E-Mail	ccucchiara@ctcnet.com

Location Information Section

Primary Location	VZ Central Office	POI CLLI	BURLVTMA
Street	266 Main Street		
City & State	Burlington VT 05401	LATA	124
Additional Information			
Secondary Location	CTC Central Office	XPOI CLLI	WLSTVT07
Street	1193 South Brownell Rd		
City & State	Williston VT 05495	NPA-NXX	802-652
Additional Information	this is a CTC POP with VZ fiber entrance facilities		

Number Of Fiber **Pairs** Required (Each Pair Equals 2 Strands) 2

Service Delivery Engineer (SDE) Information Section

Date Received	08/27/01	Date Forward to Engineering	08/28/01
SDE	Michelle Lawrence	Tel Number	617 743-6748
Street	125 High St., RM 1256	FAX Number	617 261-6461
City & State	Boston, MA 02110	E-Mail	michelle.b.lawrence@verizon.com
Date Reply To CLEC	09/05/01		

Engineering Information Section

Date Received	8/28/01	Reply To SDE By	09/13/01
Engineer	Harv Tasch	Reply Date	9/5/01
Street	140 West Street	Tel Number	
City & State	New York, NY, 10007	FAX Number	
Organization	IOF Planning	E-Mail	
Comments	NO DIRECT ROUTE BURLVTMA-WLSTVT07 NO FIBERS		

Fibers Available To Meet Request (Y/N) N If NO, Number Of Fiber **Pairs** ##

To Be Completed By Engineering:

Description	Miles	Work Activity (Hours)
Mileage for Available Dark Fiber		
Planning Engineer Hours – TM1DA (North Only)		0.5
Design Engineer Hours – TM1DB (North Only)		

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338
	)	
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
	)	
	)	CC Docket No. 98-147
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	
	)	

DECLARATION OF PATRICIA HOGUE

The undersigned, being duly sworn on oath, does say and depose as follows:

1. My name is Patricia Hogue. Presently, I am employed as a consultant for El Paso Global Networks ("EPN"), and have served as its lead negotiator in all negotiations with incumbent local exchange carriers ("ILECs") for matters relating to interconnection and access to unbundled network elements. I also supervise other EPN personnel that participate in the negotiations process.

2. I have over 32 years of telecommunications experience; the last one and one-half years with EPN. Prior to joining EPN, I was employed in a variety of positions at SBC Communications. My positions at SBC ranged from serving as its Director of Negotiations with CLECs to splicing dark fiber in manholes beneath the streets of Dallas, Texas. In between, I served as: a negotiator on interconnection agreements with CLECs; a senior account executive serving the needs of SBC's large customers, a design engineer

responsible for designing SONET deployments and day-to-day deployment of facilities in a major metropolitan wire center; a customer service representative; and, of course, as a cable splicing technician, where I spliced fiber optic cable throughout North Texas, and oversaw the use of the JMOS database. In short, in my 30-plus years of experience in the industry, I have worked on a vast array of telecommunications related matters.

3. EPN's prior experience with obtaining dark fiber from SBC in Texas illustrates that if permitted by the Commission, SBC's refusal to splice dark fiber would exclude a significant percentage of SBC's dark fiber facilities from unbundling. Specifically, of the actual dark fiber service orders submitted by EPN to SBC since 1999, a significant percentage of the dark fiber loops required splicing at least one point in the path of the fiber to provide EPN with a continuous fiber loop. If SBC had not been required to splice dark fiber loops for EPN, then the percentage of dark fiber loops ordered by EPN that would have been unavailable to EPN in the following major Texas markets is as follows: Austin 47%, Dallas 72%, Fort Worth 55%, Houston 60%, San Antonio 66%. In fact, in testimony filed in Texas in docket 25188, Mr. Chad Townes, Director for SBC, outlines the fact that SBC regularly leaves fibers stranded and unspliced, ready to be called into service as customers request high bandwidth services. These fibers are "dead count" that can be readily called into service, yet the ILECs want the deployed fiber to be artificially excluded from its unbundling obligation.

4. Termination of fiber frequently requires some splicing. In particular, ILECs routinely perform a fusion splice to connect a fiber pigtail to a fiber cable in a splice tray within the central office in order to terminate the fiber cable at a fiber distribution panel. This type of splicing is routinely performed in a controlled environment by ILECs to serve their

own customers and should be performed to terminate dark fiber in order to provide dark fiber loops and transport to CLECs. That such splicing does not implicate any network reliability issues as evidenced by the fact that ILECs routinely perform such splicing for themselves. Unless ILECs are required to perform such splicing for CLECs in order to terminate dark fiber, ILECs can deliberately leave dark fiber that has been pulled within or lies just outside the central office unspliced and unterminated in order to reduce the dark fiber inventory that is available to CLECs.

5. Parity access to ILEC dark fiber information is especially crucial because ILEC responses to CLEC requests for dark fiber have often proved to be erroneous. As a result, CLECs must have parity access to ILEC preordering and ordering information regarding dark fiber network elements that is up-to-date in order to independently determine the veracity of ILEC representations that dark fiber UNEs are unavailable. For example, SBC has routinely misstated the availability of dark fiber to EPN or withheld information on such availability choosing to play a cat and mouse game during the facility check process. SBC would not divulge the existence of dark fiber unless EPN guessed at the exact location of the demarcation point, for instance, in a multi-tenant building. SBC is not forthright with any information during the facility check process, choosing rather to look for opportunities to deny the use of UNEs to CLECs. In fact, the last twenty times that EPN checked SBC's outside plant records to determine the accuracy of SBC's representations that dark fiber was unavailable, EPN determined that contrary to SBC's representations dark fiber was in fact available but SBC deemed it not necessary to supply such fiber as an UNE to EPN by creating artificial barriers and new rules at every turn. EPN engineers have also personally inspected customer premises and found dark

fiber present, notwithstanding SBC's representations in dark fiber facility check responses that dark fiber was unavailable.

6. SBC has consistently provided inaccurate information to EPN regarding the availability of dark fiber UNEs which underscores the need for parity access to information so that CLECs can make an independent judgement regarding the availability of dark fiber UNEs. In fact, in twenty out of twenty instances in which EPN went to the expense of reviewing SBC's records after SBC advised EPN that no dark fiber was available, EPN's record review revealed that dark fiber was in fact available.

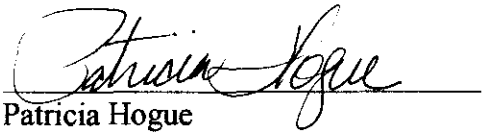
7. SBC's Design Work Orders are often the most up-to-date source of information on recently completed fiber installations and fiber installations that are in progress and near completion. Despite the Texas Public Utilities Commission's clear direction that SBC provide information regarding recently completed and in progress fiber installations, SBC often denies access to Design Work Orders ostensibly because SBC does not consider the construction complete until the data is posted in the Plant Layout Records, even if SBC has already been providing service to customers on the installed fiber for months or even over a year. Additionally, SBC regularly included route and path information, such as the location of intermediate offices and cabling numbers, on its facility check responses until March, 2001. Recently, however, SBC has apparently instructed its Local Service Center personnel to affirmatively delete such route and path information before providing the response to the CLEC.

8. While SWBT has refused to divulge its fiber standards for retail services to EPN, when any carrier splices or terminates fibers so that it may light a fiber for its own use, it would normally test for dB loss using ANSI 568-B or a comparable testing procedure. Both

testing for signal loss and reflection are standard procedures that I did for each and every fiber splicing job almost twenty years ago as a fiber optic cable splicing technician for Southwestern Bell.

9. Internally, SBC treats dark fiber as deployed fiber, regardless of whether the facility would need to be spliced in order to be called into service. For example, these fibers are recorded as deployed on SBC's Plant Layout Records database , which is used to identify facilities that can easily be called into service. Also, these dark fiber facilities are recorded as deployed in SBC's Job Management Operating System, which is tied to the property and tax databases SBC uses to identify deployed assets.

I hereby declare under penalty of perjury that the contents of the foregoing Declaration are true and correct to my personal knowledge. Executed on April 4, 2002.



Patricia Hogue

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